

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**McMANIMON, SCOTLAND  
& BAUMANN, LLC**

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*Counsel for Daryl Fred Heller, Chapter 11 Debtor  
and Debtor-in-Possession*

In re:

DARYL FRED HELLER,

Debtor.

Case No. 25-11354 (JNP)

Chapter 11

**NOTICE OF MOTION EXPUNGING CLAIM NOS. 13 THROUGH  
32 FILED BY PRESTIGE FUND A II, LLC ET AL. PURSUANT TO  
11 U.S.C. § 502 AND FED. R. BANKR. P. 3007**

**PLEASE TAKE NOTICE** that on a date and time to be set by the Court in an Order Shortening Time, or as soon thereafter as counsel may be heard, the Chapter 11 debtor and debtor-in-possession, Daryl Fred Heller (the “Debtor”) by and through his counsel, McManimon, Scotland & Baumann, LLC, will move before the Honorable Jerrold N. Poslusny, Jr., United States Bankruptcy Judge at the Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor Camden, N.J. 08101, Courtroom 4C, pursuant to his Motion expunging claim nos. 13 through 32 filed by Prestige Fund A II, LLC, et al., pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (“Motion”).

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, the Debtor will rely upon the Certification of Sari. B. Placona in Support of the Motion, as well as the brief in support of the Motion.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy in accordance with D.N.J. LBR 9013-2.

**PLEASE TAKE FURTHER NOTICE** that unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

**PLEASE TAKE FURTHER NOTICE** that oral argument is hereby waived unless timely objection is received in accordance with D.N.J. LBR 9013-3.

**PLEASE TAKE FURTHER NOTICE** that an Order granting the relief requested herein is submitted herewith and made part of the Motion herein.

**McMANIMON, SCOTLAND  
& BAUMANN, LLC**

*Counsel to Daryl Fred Heller Chapter 11  
Debtor and Debtor-in-Possession*

By: /s/ Sari B. Placona  
Sari B. Placona

Dated: May 30, 2025